

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>IN RE:</b>	)	
<b>SUSAN TOWESON</b>	)	
	)	<b>Case No. 14-48395</b>
	)	
<b>Debtor</b>	)	<b>Chapter 7</b>
_____	)	
	)	
<b>MARY E. LOPINOT,</b>	)	<b>Adversary No.</b>
<b>Plaintiff,</b>	)	
<b>v.</b>	)	
	)	
<b>JPMORGAN CASE BANK,</b>	)	
<b>NATIONAL ASSOCIATION,</b>	)	
<b>Defendant.</b>	)	
_____	)	

**Complaint To Avoid Preferential Transfers  
and To Recover Property**

COMES NOW Plaintiff by counsel, and for her Complaint states as follows:

1. Susan Toweson is a Debtor who filed her voluntary petition under Chapter 7 of Title 11 of the United States Code on October 24, 2014.
2. This Court has jurisdiction of this Proceeding pursuant to 28 U.S.C. §1334. This is a core proceeding under 28 U.S.C. §157(b)(2).
3. JPMorgan Case Bank, National Association (“Chase”) is a corporation authorized to do business under the laws of Missouri and was the holder of a personal debt owed by Debtor. Chase is a listed creditor in Debtor’s Schedules and Matrix.
4. In the 90 days prior to the time of filing, Chase received payments by Debtor totaling \$6,600.
5. Pursuant to 11 U.S.C. §547 this is a transfer which may be recovered for the Estate.
6. The funds received by Chase were preferential in that they were monies paid on an antecedent debt received within 90 days before the date of the bankruptcy filing.
7. Plaintiff seeks an order and Judgment in the amount of \$6,600 against Chase for

these preferential transfers pursuant to §§522, 547, and 550.

WHEREFORE, Plaintiff respectfully requests this Court enter its Order setting aside the transfer aforesaid, order the payment of \$6,600 to the Plaintiff and/or grant Judgment in the amount of \$6,600 as preferential transfers received by Chase and for such other and further relief as is just in the circumstances.

Dated: 10/14/2016

Law Office of Tracy A. Brown, P.C.

/s/ Tara L. Jensen

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